

February 4, 1993

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FEB 17 1993

Federal Communications Commission
Office of the Secretary
Washington, DC 20554

FCC MAIL ROOM

As a user agency of a combined 9-1-1 Dispatch Center and a user of radio frequencies in the Public Safety spectrum, we are very concerned about the proposed FCC docket 92-235.

We appreciate the fact that the FCC recognizes and is taking steps to alleviate the problems associated with the lack of mobile radio spectrum. However, we have serious concerns with portions of the docket that appear to create more problems for public safety organizations than they solve.

Only national defense is ranked higher in priority than public safety communications as established both by statute and court decision. We feel that many sections of this docket have the effect of reducing this priority and in many cases public safety communications appear to have become secondary to other users.

Our number one concern is the short term and fast track to comply with the proposed docket. Vendors are not manufacturing equipment that meets the bandwidth requirement of section 88.413 coupled with the fact that needed accessory equipment such as cavities, isolators, combiners, etc., are not manufactured and appear to be beyond the present manufacturing capabilities of vendors. Even if the equipment could be manufactured there isn't enough time allowed for systems to be purchased, installed, and tested to determine if the new equipment and technology will meet the operational needs of public safety users.

The requirement of turning the transmitter modulation down January 1, 1996 will in effect create operational hardships to existing systems. Some manufacturing designs do not permit the reduction of the transmitter modulation to the level specified in section 88.413. Many of the current radio receivers do not have circuits that allow receiver bandwidths to be easily reduced. In fact most receivers have integrated designs that have been "optimized" for selectivity, sensitivity, desensitization, and intermod rejection. Arbitrarily reducing the modulation the receiver hears will impact the total operating characteristics of the receiver, consequently, it may be impossible for these receivers to operate satisfactorily with reduced modulation. Present designs of transmitters and receivers could require extensive modification to meet the requirements of the docket or the needs of the users. The alternative would be the purchase of new equipment, (if available), to continue providing service to the taxpayers of our various jurisdictions.

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Section 88.429 requires that transmitter power levels be reduced. Some transmitters presently manufactured cannot have the power reduced without creating spurious emissions. Wide area radio systems currently in operation would have to add more sites and transmitters to maintain the level of coverage they currently utilize. This requirement would necessitate the use of more frequencies and more sites which negates the spectrum efficiency the docket is attempting to develop. In addition the need for more sites will cause additional RF "clutter" in the form of intermod, adjacent channel interference, and on channel interference. Space between sites would become a large issue and coordination nightmare due to the fact coordinators representing the various user blocks do not share the same data base.

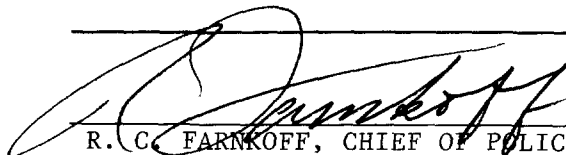
The impact of the docket to our budget and the budgets of like agencies will be severe. The short time frame for changeover, the possible need for existing equipment modification in the short term, and complete equipment replacement in the long term, combined with the need for many more radio sites, will create a situation that many agencies will not be able to meet financially. This will open the door for 3rd party providers to license and provide services in the public safety band. This is a definite threat to public safety agencies being able to control their own radio systems. There is no room in the police, fire, and emergency medical communication environment which allows for 3rd party priorities, conflict arbitration, or cost/profit margins.

Our specific requests with regards to public safety and docket 92-235 are these.

1. Extend the total time involved to insure manufacturers can manufacture equipment that can meet the requirements of the docket.
2. Allow a period of time for testing of the equipment manufactured to meet docket 92-235 to insure it will meet the ever changing needs of the public safety environment.
3. Except for the trunking systems reserve bands within the public safety band for police, fire, emergency medical services.
4. Address the issue of migration that allows for gradual change to the new radio equipment and is more tolerant of dual operation of present and new equipment.
5. Insure that required paging systems will work with the proposed modulation scheme.
6. Address the wide area coverage needs required by some public safety entities, both for local operations and mutual aid situations.

7. Protect the public safety band from 3rd party and entrepreneur licensees.
8. Insure the quality of public safety communications will not be sacrificed for the sake of spectrum efficiency.

In conclusion we feel that docket 92-235 should recognize and make provisions for the unique needs of the public safety service. The need for high quality and reliable communications needed to respond to the public in a rapid and efficient manner should not be compromised. Issues raised by this letter and various papers sent to you by APCO on behalf of the public safety organizations in the United States must be addressed.



R. C. FARNKOFF, CHIEF OF POLICE CITY OF KENNEWICK